

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:19CR559
)	
Plaintiff,)	JUDGE SARA LIOI
)	
v.)	
)	
DEEPAK RAHEJA,)	<u>MOTION TO PARTIALLY UNSEAL</u>
GREGORY HAYSLETTE,)	<u>SEARCH WARRANTS, APPLICATIONS</u>
FRANK MAZZUCCO,)	<u>AND AFFIDAVITS IN SUPPORT</u>
BHUPINDER SAWHNY,)	
)	
Defendants.)	

Now comes the United States of America, by and through its counsel, Justin E. Herdman, United States Attorney, and Michael L. Collyer and Megan R. Miller, Assistant United States Attorneys, and respectfully moves the Court for an Order partially unsealing the federal search warrants, applications and affidavits in support filed under Case Nos. 1:16MJ9076, 1:16MJ9077, 1:16MJ9078, 1:16MJ9082, 1:16MJ9093, 1:16MJ9094, 1:16MJ9095, 1:16MJ9096, and 1:16MJ9097, so that the government may disclose them to defense counsel in connection with on-going discovery production in this case, pursuant to Rule 16 of the Federal Rules of Criminal Procedure.

The search warrants in Case Nos. 1:16MJ9076, 1:16MJ9077, 1:16MJ9078, 1:16MJ9082, 1:16MJ9093, 1:16MJ9094, 1:16MJ9095, 1:16MJ9096, and 1:16MJ9097, including the applications and affidavits in support, were ordered sealed at the government's request. Because the above-described sealed documents contain specific information about cooperating individuals and other witnesses, contain specific information regarding uncharged conduct, and contain information about individuals who have not been charged with criminal conduct, the Government requests that it not be required to fully unseal these documents. Instead, the

Government asks that it be permitted to disclose copies of these sealed documents only to each defense counsel of record, who will be permitted to share these documents with their respective clients. The Government requests that the orders currently in place sealing the above-described documents remain intact with only a partial unsealing for the limited purpose of providing discovery to defendants under the terms of a protective order that the United States requested from the Court in Doc. 44.

Accordingly, the United States of America respectfully moves the Court to enter an Order partially unsealing the search warrants, applications and affidavits in support filed in Case Nos. 1:16MJ9076, 1:16MJ9077, 1:16MJ9078, 1:16MJ9082, 1:16MJ9093, 1:16MJ9094, 1:16MJ9095, 1:16MJ9096, and 1:16MJ9097. A proposed order is attached.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

By: /s/ Michael L. Collyer
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of October 2019 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Michael L. Collyer

Michael L. Collyer
Assistant U.S. Attorney